

18 September of 1996?

19 A. I think, going back to that particular place and
20 time, one, it wasn't anticipated and history proves that
21 there wasn't very much activity in resale at that time,
22 and looking at our business and knowing what those things
23 cost, we had plans in place to do the work and to
24 implement those systems.

25 But there was no need for those systems, and you
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1 had, unless you wanted to spend tens of millions of
2 dollars, to have everything in place, including the people
3 to run it, and for a period of six months or half-a-year
4 or longer, not even utilize those systems.

5 It's not good business. So looking at it, you
6 know, historically, if I had to do it all over again,
7 hindsight is really wonderful, and I'd have done things
8 differently. But at that period of time, in my experience
9 in business, I would have probably made the same decision.
10 Why spend all that money if you are not using it. It's a
11 very expensive --

12 Q. Now, among your responsibilities was not the
13 responsibility to make the decisions about what systems or
14 processes to put in place at the LISC; is that right?

15 A. My responsibilities as part of the senior
16 leadership team on industry markets, those are the
17 executives of industry markets that run the business, is
18 to advise of business decisions, develop policy and
19 strategy that affects the wholesale business. That's my
20 job, so I would make recommendations to the appropriate

21 individuals.

22 Q. Now, in connection with doing that, would you
23 look at Pacific's forecast of likely -- would you look at
24 Pacific's forecast of expected resale lines to be migrated
25 in order to determine what systems or processes should be
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1 implemented?

2 A. Are you asking me what our forecasts were for
3 migration --

4 Q. Not yet, but --

5 A. We asked the CLC's for forecasts at that time,
6 and we did not see activity sufficient to warrant over
7 building or implementation of all those things.

8 Q. Are you familiar with forecasts that Pacific
9 Bell made as to resale lines that would be migrated during
10 calendar year 1996?

11 A. I really don't remember what the numbers were.

12 Q. Were those ever provided to you in connection
13 with senior leadership team activities?

14 A. You know, they may have been but I don't really
15 remember.

16 Q. Maybe I can show you a document or two.

17 If you could just take a quick perusal of
18 documents -- this is Exhibit 11, and then 12 through 15
19 are also documents that were produced at Laura Schwartz'
20 deposition as forecast documents.

21 A. Okay.

22 Q. Can you take a quick look at those.

23 A. Seeing them in this format doesn't ring a bell.

24 Q. It does not?

25 A. No, but they are not totally huge numbers.

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1 That's not saying that I haven't seen those numbers

2 before. I see so many documents with so many numbers on

3 them that it would be very difficult for me to say, yes, I

4 remember exactly those numbers.

5 Q. No, I wasn't going to test your memory about

6 what you may have seen, but what I wanted to try to get a

7 sense of was --

8 A. Small volumes.

9 Q. Let me finish the question. In the course of

10 your activities in the senior leadership team, one of the

11 things that you were called upon to do is provide input as

12 to how the LISC should be organized and set up. Do you

13 have a recollection of examining or discussing with anyone

14 forecasted volumes?

15 A. Gosh, I may have, but I don't recall.

16 Q. Well, if you were trying to determine how to

17 plan for the LISC operation, don't you think you'd want to

18 know what the best estimate is of the anticipated volume?

19 A. Yeah, but remember that we defined my role as

20 before. Jerry, since, is responsible for doing that, and

21 when we discussed those things and everything seemed to

22 be, at this particular time, okay -- I mean, as I just

23 stated to you, I wouldn't have any reason to question

24 Jerry if those things were happening, and quite frankly,

25 everything seemed to be okay.

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1 Jerry gave statuses on our voice mail of how

2 many orders were received by the LISC, and generally, it

3 was zero, one, two, three, something like that, so I

4 didn't have any concern but I was very surprised.

5 Q. Were you aware that the Pacific Bell forecasts

6 of expected resale migrations for calendar year 1996

7 dropped over a period of time during 1996?

8 A. That they dropped?

9 Q. Yeah.

10 A. No, I don't recall.

11 Q. But to make sure I understand your testimony,

12 essentially, you relied upon Mr. Sinn's analysis and

13 projection and his planning, and based upon information

14 that was available to you, it seemed reasonable, given all

15 the information that you had?

16 A. That's correct.

17 MR. KOLTO-WININGER: When you get to a natural

18 point, I need a minute or two.

19 MR. McDONALD: Do you want to take a break now?

20 MR. KOLTO-WININGER: Sure.

21 MR. McDONALD: That's fine.

22 (Recess taken.)

23 MR. McDONALD: Back on the record.

24 Q. Now, we've talked about the systems or lack of

25 systems or processes for receipt of orders and the

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1 tracking of orders, and we also talked about the four-hour

2 FOC interval.

3 Were you also apprised of complaints that were
4 voiced by CLC's regarding end users losing dial tone?

5 A. Yes.

6 Q. And when did you hear that?

7 A. I heard of that in a letter that was written to
8 me -- it was either written to me or to my boss, I can't
9 remember, to Liz Fetter by Michael Beech, one of the vice
10 presidents of MCI.

11 Q. Do you know about when that may have occurred?

12 A. I am not sure of the date. I see so many
13 different letters and correspondence, I'd be guessing.

14 Q. I don't want you to guess.

15 A. I don't want to guess.

16 Q. To your recollection, did that occur after the
17 issue was raised of the timeliness of the four-hour FOC?

18 A. I am sure it was.

19 Q. Were you involved in undertaking to determine
20 what the cause of the dial tone problem was?

21 A. Yes.

22 Q. What was your involvement?

23 A. Again, in getting feedback and resolution from
24 the account team; they investigated why that happened,
25 what the causes were.

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1 Q. So people on the MCI account team were charged
2 with trying to determine what the cause might be?

3 A. Yes.

4 Q. And do you remember who in particular? Was
5 there an individual or --

6 A. The people who were working resale, Debbie
7 Nightingale, the director, along with her people, Sue
8 Fischer, the RMC, others.

9 Q. And do you know what they were able to
10 determine?

11 A. Dial tone loss was determined to be a result of
12 the migration orders in the difference between the
13 conversion during -- during a migration order from CRIS
14 billing to CABS billing. There had to be, literally, a
15 coordination between a new connect and a disconnect, and
16 that -- if that wasn't coordinated exactly or if that
17 wasn't coordinated properly, there could be a loss of dial
18 tone.

19 Q. So you learned that loss of dial tone could
20 result from the failure to keep intact these two paired
21 orders, the disconnect and the reconnect, or change order?

22 A. Uhm-hum, yes. It's not a change order. It's
23 really -- the migration involves disconnecting the old
24 service from Pacific Bell and connecting to the new
25 service, to the CLC.

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1 Q. Physically, is that what actually occurs?

2 A. Yes.

3 Q. And were you aware that there was some effort
4 made to resolve the loss of dial tone problem and what
5 that was?

6 A. Yes. We knew what caused it, and then we were
7 trying to determine the magnitude of that.

8 Q. And what did you do, or what did anyone at
9 Pacific do, to try to determine the magnitude of the
10 problem?

11 A. It appeared from the complaint from MCI that we
12 were disconnecting or causing a lot of no dial tone
13 outages. We investigated and found that the number of
14 loss of service in migrations was very, very small. In
15 fact, less than, I believe, a tenth of a percent.

16 And to further augment that, we asked MCI,
17 because I was part of the request to communicate with the
18 end-user customers to explain that their dial tone loss
19 was a result of a migration with Pacific Bell resale
20 services, and that it was not a cause of MCI, I agreed
21 with Michael Beech to have other people write to end
22 users, to anyone that that happened to, and we received
23 seven requests to do it. So it was very small, in terms
24 of the order of magnitude of the total number of orders.

25 Q. I think you said your understanding was that the
0038 1 loss of dial tone occurred in one tenth of one percent?

2 A. Very small.

3 Q. As a percentage of what, a percentage of resale
4 orders, a percentage of migrated customers?

5 A. Total migration orders, and then that was
6 compared, you know -- we were trying to keep parity with
7 the retail business. And actually, it's less than the
8 percentage of the no dial tone, for whatever reasons, of
9 the retail business in establishing new service or
10 changing service with Pacific Bell.

11 Q. And how did you go about determining what that
12 percentage or ratio was for Pacific Bell's retail
13 business?

14 A. Pacific Bell keeps records, it's called, "I"
15 Reports, the letter I, Installation Reports, and they have
16 report rates for every cause of problems and installing
17 service. And if, during the installation process, an out
18 of service condition occurs, it's computerized and
19 obviously resolved.

20 The customer complaints, we get the complaint,
21 resolve it, fix the problem, and then input that into the
22 system. If it happened within 30 days of the
23 installation, it's called an "I" report. After 30 days,
24 it's a maintenance report, an actual report.

25 We have report rates that tell us, for the
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1 entire population of Pacific Bell services, what those
2 numbers are.

3 Q. Now, did you also learn of other problems that
4 were identified by CLC's, such as a loss of features?

5 A. Yes.

6 Q. Did you do anything upon learning of that?

7 A. Yes. I asked, again, the people who worked on
8 the account teams to investigate that, and a variety of
9 reasons for loss of features were communicated to me. By
10 the way, all of these were discussed quite openly in our
11 executive conference calls with Terri Farmer, Michael
12 Beech, and others who worked for MCI.

13 The features were -- or the assumption that
14 there was a loss of features during migration, in some
15 instances, those features were not input correctly or were
16 not input at all, as a result of not being ordered and
17 then added later.

18 Also, hunting, which was considered loss of
19 features, was not inputted correctly. We found errors
20 where hunting had been added later. It should have been
21 added upfront in the order.

22 And when you have a problem with hunting, which
23 means that the first line is attached to the second line,
24 to the third line, to the fourth line, so that when a

25 customer or, pardon me, when a person calls that person,
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1 they will get the first line, and if it's busy, it hunts
2 to the second line. Well, if hunting is not put in, you
3 get a busy signal; it appears like they are out of
4 service; they are not receiving those calls. So the end
5 user may complain and say, I don't have service when, in
6 fact, they do but a feature was left out.

7 There was some confusion around that as well.
8 The majority of the time, to the best of my recollection,
9 when we investigated feature loss or hunting problems, we
10 found that they had not been inputted upfront in the
11 initial order and overlooked, or they were done
12 improperly. They were always corrected afterwards and
13 added and reconciled.

14 Q. Did you also hear of complaints about end users
15 being dropped from the 411 database?

16 A. Yes, I did.

17 Q. Do you remember when you heard about that?

18 A. Probably at the same time. That was another one
19 of the issues we discussed simultaneous with all these
20 issues. It was one of the many issues.

21 Q. And did you do anything upon hearing of that
22 problem?

23 A. Yes, we investigated that as well.

24 Q. And your account team was delegated the task to
25 do that investigation?
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1 A. Yes, and most of the LISC as well, yeah.

2 Q. Do you know what was done thereafter?

3 A. I received -- as a matter of fact, coincident
4 with that request I received from Michael Beech at MCI, I
5 am on the MCI mail network, two or three specific
6 customers, to help to get those back into the listings.
7 There was a lag-time in the backlog of some of these
8 customers, and my understanding was that they were dropped
9 out of there. Basically, they hadn't been completed
10 because of the backlog, and that's what was happening, so
11 we gave special attention to those specific customers that
12 appeared to be victims of that -- of the backlog.

13 Q. Was there any change, to your knowledge,
14 undertaken with respect to systems or processes to try to
15 avoid further loss of 411 listing?

16 A. Yes. There were numerous things that were
17 recommended to MCI. One of those was to migrate the order

18 as is, so that everything would just flow through, and
19 then add any changes that needed to be done, to put in a
20 subsequent change order to change the service to what the
21 customer wanted.

22 That was discussed with MCI, and in some
23 instances, it seemed to be appropriate, but they
24 ultimately rejected wanting to do that. They also -- I
25 believe there was an opportunity to have -- to put the as
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1 is in FID, which is an identifier that goes on the order,
2 to allow the order to remain intact. That was recommended
3 to MCI.

4 Q. To your knowledge, were there any changes to the
5 Pacific Bell processes or systems implemented to avoid the
6 411 database loss?

7 A. In all honesty, in terms of -- again, my
8 involvement is very general. I don't recall any
9 technical -- from the technical standpoint, any system
10 changes that may have been made. There may have been some
11 things done to help in getting accurate information back
12 to the CLC, so they can see what was being inputted, what
13 the customer records were, the CSR and that sort of thing,
14 but I don't recall the specifics on that.

15 Q. Do you recall other complaints from CLC's as to
16 end-user difficulties, in addition to the loss of dial
17 tone, loss of feature or loss of listing?

18 A. From the service standpoint, I think you pretty
19 much covered all of it, yes.

20 Q. Have you heard anything to the effect that some

21 end users were apprised that they may lose their Yellow

22 Page listing, in the event the migration order was

23 processed?

24 A. Apprised by whom?

25 Q. By anyone.

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1 A. I don't believe so.

2 Q. In connection with these end-user problems that

3 you have just testified about, are you aware of a

4 procedure for escalation of such problems that existed at

5 the LISC?

6 A. Yes, there were. I believe there were

7 escalation processes that were communicated to the CLC's.

8 Q. And do you know if that escalation procedure was

9 communicated to the CLC's back in, say, November, December

10 of 1996?

11 A. I would assume it was, to the best of my

12 recollection, because I am sure, ultimately, I was on that

13 and had received some calls.

14 Q. To your knowledge, when a CLC experienced, say,

15 an end user who lost a dial tone, was there an established

16 procedure for the CLC to follow, in order to try to

17 rectify that situation?

18 A. I believe there is, yes.

19 Q. Who, to your knowledge, is most knowledgeable

20 about that procedure?

21 A. Who is knowledgeable about -- in Pacific Bell or

22 in the CLC?

23 Q. Pacific Bell.

24 A. The processes would be very -- probably were

25 written by people in the LISC, managers of the LISC, who
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1 developed those processes and said who to call, what

2 numbers to call.

3 Q. And, I think, you mentioned earlier, did you

4 find that you became the recipient, at least in some

5 instances, of the conveying of information to Pacific by

6 the CLC as to such problems?

7 A. Yeah, I would. I mean, I was contacted by

8 Michael Beech or Terri Farmer in some way, yes, either by

9 phone or by E-mail or something.

10 Q. And when you were contacted, you then instructed

11 one or more people in the account team to address the

12 problem?

13 A. Yes, to find out what was going on and to get

14 back with MCI.

15 Q. Did you communicate directly with people at the

16 LISC about such problems?

17 A. Very rarely. At this particular time, the

18 resale people on the account team worked directly with the

19 LISC, so I worked through them because I am more familiar

20 with them.

21 Q. Did you hear complaints from CLC's regarding

22 inability to communicate with individuals at the LISC to

23 convey information about such problems?

24 A. That was discussed at our executive meetings.

25 John Stankey -- I believe Michael Beech stated to him that

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1 there were difficulties in getting into the phone systems,
2 or whatever. They were converting a phone system at one
3 time, and until the new system came in, sometimes it was
4 difficult getting through. I believe those problems were
5 generally reconciled.

6 Q. Do you know about when the problem existed and
7 when it was reconciled, in terms of the telephone
8 inquiries going into the LISC?

9 A. It was in the December time frame, I believe.

10 Q. Let me show you a two-page document. I guess we
11 will probably have this marked. You can take a quick look
12 at it.

13 THE WITNESS: Okay.

14 MR. McDONALD: Maybe we should ask the reporter
15 to mark it before we go any further.

16 (Whereupon, Exhibit No. 17 was marked
17 for identification.)

18 MR. McDONALD: Q. So what we have is a two-page
19 document that's been marked Exhibit 17, and at the top, it
20 has a date of February 20th, 1997. Does this look
21 familiar to you?

22 A. Yeah. That's an MCI mail message that I sent to
23 Michael Beech.

24 Q. And Mr. Beech is with MCI?

25 A. Yeah, he is a vice president of MCI, responsible
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1 for local competition and access for the western region.

2 Q. And this addressed what issue?

3 A. Problems with the call director, automated call
4 director in the LISC.

5 Q. Does that relate to the inability of MCI to
6 communicate with LISC representatives?

7 A. Yeah. It represents either being placed on
8 hold, and I think in this particular instance, the
9 equipment was -- I speak quickly, I apologize.

10 The equipment was not getting through to the
11 proper people and, see, people would ring, and then it was
12 click, like it was going on, and then it would go to
13 everyone. Plans had been made to order new equipment and
14 to put that in place, and it couldn't happen fast enough
15 at that particular time because the equipment was
16 malfunctioning.

17 Q. So you received this message, I believe, on or
18 about February 19th, and you responded on or about
19 February 20th?

20 A. Yes.

21 Q. Is it fair for me to infer that after receipt of
22 this message you undertook some investigation of your own
23 and then determined that there was a problem with the ACD?

24 A. Uhm-hum.

25 Q. I think that's what the message refers to, and
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1 expressed a desire to try to get this fixed as soon as
2 possible?

3 A. That's correct.

4 Q. That's as recently as February of this year?

5 A. Yes.

6 Q. Do you know if that issue was resolved?

7 A. I believe it was.

8 Q. You have not heard current complaints?

9 A. I haven't heard any complaints. The absence of
10 complaints on that particular subject would mean that it's
11 fixed, hopefully.

12 Q. Did you learn of complaints that were voiced by
13 CLC's that Pacific was resistant to escalating certain
14 matters to resolve a problem identified with a particular
15 resale order, because Pacific took the view it wasn't --
16 the problem didn't warrant an escalation?

17 A. No, I am totally unaware of anything like that.

18 Q. You mentioned earlier the issue of parity and
19 trying to ensure that the resale end user receives service
20 on par with Pacific Bell retail end user; is that fair?

21 A. That's correct.

22 Q. Are there measures that you are aware of that
23 Pacific Bell undertakes to ensure that that occurs?

24 A. Yes.

25 Q. And what measures are you aware of?
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1 A. There are performance reports, as a result of
2 interconnection agreements, that reflect Pacific Bell's
3 retail side, and the variety of measures, and then report
4 performance of the resale products and services to that
5 particular CLEC.

6 Q. Are you a recipient of those reports?

7 A. I believe that AT&T got those and then Sprint

8 and then MCI as well, and I have received and seen those
9 documents.

10 Q. So it's your understanding that those documents
11 are provided to the CLEC's as well?

12 A. Yes, and they are prepared out of Jerry Sinn's
13 organization.

14 Q. Do you know how frequently those documents are
15 prepared?

16 A. I believe monthly is the agreement in the
17 contract. It could differ, depending on what was
18 negotiated in the contract, but I believe that, generally,
19 that's what is prepared.

20 Q. In connection with complaints from CLEC's, did
21 you ever hear of complaints being voiced about delays in
22 obtaining repairs for migrating or migrated customers?

23 A. There may have been complaints made. If they
24 were an issue, they weren't a very large issue because I
25 didn't get involved.
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1 Q. So your best recollection is you may have heard
2 about them, but you were not involved in any attempt to
3 resolve them?

4 A. That's correct.

5 Q. Now, other than what you previously described in
6 connection with the -- is it the senior leadership team?

7 A. Yes.

8 Q. Did you have any other involvement in the
9 planning for the LISC, in terms of staffing or systems or
10 processes?

11 A. No. With one exception, and that is, we were
12 asked to submit input from the customers around forecasts
13 and volumes, so those are the kinds of things that we
14 provided.

15 Q. Are you familiar with the systems that are used
16 at the LISC?

17 A. Peripherally, they are new systems, but I have
18 seen them, yes.

19 Q. Are you aware of the March 31 release that was
20 implemented at the LISC?

21 A. Is that the 1.5 release that you are referring
22 to?

23 Q. I believe so.

24 A. Yes.

25 Q. Do you know how that release performed?
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1 A. My understanding is that it substantially slowed
2 down the processing of orders.

3 Q. Do you have an understanding as to why that
4 occurred?

5 A. I don't know why, technically, it occurred. I
6 just know that it did occur.

7 Q. Do you have an understanding of what's being
8 done as a result of that?

9 A. I was told that it was being -- that it had been
10 fixed.

11 Q. That is, as of when, that it was fixed?

12 A. It was within a week of the March 31st date,

13 because I know -- I recall John Stankey making the
14 statement that if they could not come up with a
15 resolution, software resolution, that he would revert back
16 to the old system.

17 Q. Are you familiar with another release that's
18 planned for May 31?

19 A. Yes.

20 Q. And what's your understanding that that release
21 is intended to do?

22 A. That release will allow the general migration
23 order to flow through the system without any manual
24 intervention, a substantial improvement. It will also
25 make the point of having a Firm Order Completion a mute
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1 point. There would be no need for that, because it would
2 flow through immediately. The CLC will know that it's
3 been done.

4 Q. Now, in connection with the LISC's operation
5 since September 1996 -- I am not sure we have used the
6 term yet or maybe we have, but does the term backlog mean
7 something to you?

8 A. Yes.

9 Q. What do you understand the backlog at the LISC
10 to be?

11 A. Currently?

12 Q. Well, during the time period --

13 A. In terms of numbers, or what is a backlog?

14 Q. Yeah, what is a backlog?

15 A. A backlog is an order that has not been

16 processed, that it's still waiting to be processed. As
17 opposed to an order that was inputted into the NDM system
18 and goes through within a 24-hour period.

19 Q. And why did you pick a 24-hour period?

20 A. There are two particular measurements here,
21 depending on the interconnection agreement contract. But
22 generally, the two things in the manual process that's
23 being looked at is a FOC, four-hour Firm Order Completion,
24 and a 24-hour completion, okay?

25 So one is receipt of the order and say we've got
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1 it, and the other one is completing the order, and it's in
2 the system and with a due date. And if it's not done in
3 that period of time, and there are orders that are waiting
4 to be done, that's considered a backlog. That's what I
5 would consider a backlog.

6 Q. How about the issuance of completion notices?

7 Is that an element of backlog?

8 A. Obviously, if you haven't received it, you don't
9 have knowledge that the order has been completed, then
10 obviously, it's part of your backlog. If you are not a
11 recipient of the completion, yeah.

12 Q. Do you understand that it's significant to a CLC
13 to receive the completion notice in order for it to --
14 well, do you understand it's significant to the CLC to
15 receive the completion notice?

16 A. Absolutely.

17 Q. Why do you think that is important?

18 A. So that they can begin billing, obviously.

19 Q. So that if an order were submitted and migrated

20 within three days, but the completion notice isn't issued

21 for a week, would you consider that to have been a timely

22 migration?

23 A. No.

24 Q. And the reason for that is because the

25 completion notice was not issued timely?

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1 A. Correct.

2 Q. Now, as to the backlog that you are aware of

3 with the LISC, did that include lack of timely FOC's, lack

4 of timely migration, and lack of timely issuance of

5 completion notices?

6 A. Yes, all of the above.

7 Q. And if any one of those was not timely, would

8 you include that in your definition of what is part of the

9 backlog?

10 A. Yes, I would.

11 Q. And just so I am clear, at one point in your

12 testimony earlier, you made mention of a 24-hour period.

13 I think some of the other witnesses have talked about a

14 three-day period for the migration order to be

15 implemented?

16 A. That's correct.

17 Q. So when you were talking about a 24-hour period,

18 were you using that as simply an example, or what was the

19 basis for that?

20 A. There is a variety of differences, I guess,

21 between CLEC's, but first, we have a four-hour Firm Order
22 Completion, and then the implementation that you described
23 is -- is and could be three days. My understanding is
24 that there is a -- that the order be sent back. Besides,
25 the firm order completion that it's now in the system
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1 within 24 hours of -- so that's in the system, that we
2 have it, receipt of it -- processed, I guess is a word
3 you'd use.

4 Q. Now, in your position as the head of the account
5 team -- or account team for three different competing
6 carriers, I guess, did you implement any system to try to
7 aggregate common issues that were being voiced by
8 different CLEC's in order to determine if there were --
9 these common problems had a common solution?

10 A. The issues that are being brought up were common
11 to all of the CLEC's. It was a common list of issues.
12 Did I individually bring up those issues? I -- I have
13 spoken with numerous people who are responsible for the
14 other CLEC's as well, and there were similar issues.

15 Q. But was there any -- the testimony that we
16 received from members of the account team was that there
17 was no mechanism in place for there to be a reporting of
18 these CLEC problems so that there could be a comprehensive
19 examination.

20 MR. KOLTO-WININGER: I will object that it
21 mischaracterizes the testimony. But go ahead and answer.

22 THE WITNESS: I would disagree with that. The

23 senior level, we would bring it to the attention of John
24 Stankey, or earlier, Jerry Sinn issues. The big CLEC's,
25 the big carriers are handled individually, and the common
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1 issue is John Stankey. I know Jerry Sinn, as well,
2 acknowledged common areas of problem areas that were
3 communicated to members of the LISC, and other people that
4 have to do with process and problem resolution.

5 MR. McDONALD: Q. How is that information
6 conveyed to people at the LISC? Was it as problems were
7 identified, if something was escalated to you, and then
8 you referred it to the account team to work with people at
9 the LISC? Was it your understanding that by having that
10 information conveyed to the LISC, that would be the place
11 where the -- that would be the place where that -- the
12 analysis of the aggregate individual CLEC problems could
13 be examined?

14 A. Yeah. Yes and no. There are people such as
15 Lesley Wood, who is the director responsible for process,
16 who would meet with the resale consultants and people of
17 the account teams on a regular basis, along with Mike
18 Attiyeh, A-t-t-i-y-e-h, I believe is how it's spelled, who
19 is the director responsible for resale and product on the
20 management side.

21 So they would have weekly forums to talk about
22 all the issues in the LISC with people from the LISC,
23 process people, and senior management, to work on areas
24 and common problems.

25 Q. At any point from, say, September 1996, forward,

0056

1 were you informed about the LISC's capacity to process

2 orders, say, in terms of orders per day?

3 A. Between September and --

4 Q. And the current time.

5 A. Sure, yes.

6 Q. How were you apprised of that?

7 A. I received, first, some reports out of the NDM

8 system, plus the manual tracking reports of how many

9 orders had been processed, how many were waiting being

10 processed and that kind of thing, by customer.

11 Q. For each customer?

12 A. (No audible response.)

13 MR. KOLTO-WININGER: Did you say my customer

14 or --

15 THE WITNESS: No, by customer.

16 MR. KOLTO-WININGER: Thanks.

17 MR. McDONALD: Q. What, if anything, did you do

18 with that information?

19 A. Looked at it and used it in our discussions with

20 the various CLC's individually, and the executive

21 conference calls, and that kind of thing. Talked about it

22 with John Stankey, Jerry Sinn, whoever was in charge at

23 the time of those calls, trying to get a consensus and

24 agreement with the CLC's, particularly with MCI, you know,

25 specifically on backlog orders and that kind of thing.

0057

1 Q. With what frequency did you receive those

2 reports?

3 A. At one time, I was receiving those reports on a
4 daily basis. They were E-mailed to me.

5 Q. Is that ongoing today as well?

6 A. I don't get everything daily. I get weekly
7 statuses of where we are.

8 Q. And you are aware that currently there's a
9 backlog?

10 A. Yes.

11 Q. And as of today, do you know how many days
12 behind the LISC is?

13 A. How many days behind?

14 Q. Yes.

15 A. No, I don't know how many days behind the LISC
16 is. I know that there is a fairly substantial backlog.

17 Q. Does a report that you receive identify that as
18 of a date certain the LISC is working on orders through
19 another date certain?

20 A. I have seen reports like that, but I don't
21 receive anything specifically like that any longer. I
22 just -- I know how much by customer, is where I am
23 concerned, and that's where I deal with MCI and Sprint. I
24 get those reports so I can talk intelligently with their
25 executives.

0058

1 MR. McDONALD: I don't think I've got
2 anything -- let me make a quick check and see if something
3 came into my office, but I think I may well be done.

4 THE WITNESS: Okay.

5 (Recess taken.)